## SCHEDULE H (Form 1120-F)

**Deductions Allocated To Effectively Connected Income Under Regulations Section 1.861-8** 

► Attach to Form 1120-F. See separate instructions.

**Employer identification number** 

OMB No. 1545-0126

Department of the Treasury Internal Revenue Service Name of corporation

Part I Deductions Directly Allocated and Apportioned to ECI and Non-ECI Note. Enter all amounts in Part I in functional currency. Specify functional currency ▶ 1 Adjustments for U.S. tax principles (attach schedule - see instructions) 2 2 3 Total adjusted deductions on the books of the home office. Combine lines 1 and 2 Interest expense (included in line 3) (in foreign currency) 4 5 Bad debt expense (included in line 3) (in foreign currrency). 6 Total of interest expense and bad debt expense. Add lines 4 and 5. . . 6 7 General and administrative deductions included in line 3. Subtract line 6 from line 3 7 Deductions directly allocable to non-effectively connected income from subsidiaries Deductions directly allocable to other non-effectively connected income 9 booked in the home country . . . . . . Deductions directly allocable to other non-effectively connected income booked in other countries (including the United States) . . . . . . . 10 11 11 Remaining deductions on the books of the home office allocable under Regulations section 12 Less: Deductions directly allocated to effectively connected income . . . . . . . . . . . . . . . . 13 13 Remaining deductions on the books of the home office indirectly allocable under Regulations 14 Home Office Deductions Indirectly Allocated and Apportioned to ECI and Non-ECI Note. Enter the amounts in Part II, lines 16 through 21, in U.S. dollars. 15 Average exchange rate used to convert allocable deductions to U.S. dollars (see instructions) . . . 15 Deductions from line 14, in U.S. dollars, indirectly allocable under section 1.861-8. Multiply line 16 17 17 Indirect allocation and apportionment of line 16 amount to ECI (attach computation) . . . . . . . . 18 Deductions directly allocated to ECI from line 13, in U.S. dollars. Multiply line 13 by line 15. 19 Total home office deductions allocated to effectively connected income. Add lines 17 and 18 Total deductions from other non-U.S. locations allocated and apportioned to effectively 20 Total deductions allocated and apportioned to effectively connected income. Add lines 19 and 20 and enter the amount here and on Form 1120F, section II, line 26 . . . . . . . Part III Indirect Allocation and Apportionment Methods and Financial Records Note. Enter the amounts in Part III, lines 22a, 22b, 23a, 23b, and 25 (if applicable), in functional currency. Gross Income Ratio: 22a a Effectively connected gross income . . . . 22b % c Divide line 22a by line 22b . . . . . Gross Asset Ratio: 23 23a a Average U.S. assets from Schedule I, line 5, column (d) . . . 23b **b** Average worldwide assets from Schedule I, line 6b, if applicable 23c % c Divide line 23a by line 23b Number of Personnel: 24a a Personnel of U.S. trade or business within the United States. **b** Worldwide personnel of foreign corporation 24c % c Divide line 24a by line 24b Other ratio based methods (attach schedule) Other methods (e.g., time spent analysis) (attach schedule)

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## Indirect Allocation and Apportionment Methods and Financial Records (continued) Financial and other records used to identify deductions allocated and apportioned to ECI No Yes 27a Published or other non-public audited financial statements Home office management or other departmental cost accounting reports Other (e.g., home country regulatory reports) (attach schedule) Part IV Allocation and Apportionment of Deductions on Books and Records Used to Prepare Form 1120F, Schedule L Note. Enter all amounts in Part IV in U.S. dollars. 30 Total expenses per books and records used to prepare Form 1120F, Schedule L 30 31 Adjustments for U.S. tax principles (attach schedule - see instructions) 31 32 32 Total deductions per line 30 books and records. Combine lines 30 and 31 33a 33a Third party interest expense per books and records 33b **b** Interbranch interest expense per books and records 34 Bad debt expense per books and records 35 Other third party deductions not allocable (attach schedule) 35 36 36 Interbranch expenses per books not included on line 32b (attach schedule). 37 37 Add lines 33a through 36 . . . 38 Deductions on books and records allocable and apportionable under Regulations section 1.861-8. Subtract line 37 from line 30 38 (c) Reconciliation of allocable expenses on books under Reg. 1.861-8 (from (a) Add columns (a) **ECI** Amounts Non-ECI Amounts line 38) and (b) 39a Derivative transaction deductions directly allocated under 39a section 1.861-8 (from line 38) 39b **b** Other deductions directly allocated and apportioned . . . Total expenses directly allocated and apportioned. Add lines 40 39a and 39b Deductions on books and records indirectly allocated and 41 apportioned Total deductions allocated and apportioned. Add lines 40 and 41.

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Column (c) must equal line 38 . . . . . . . . . .